IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF GEORGIA MACON DIVISION

UNITED STATES OF AMERICA :

CRIMINAL NO. 5:21-MJ-___8__

vs.

:

WILLIAM McCALL CALHOUN, JR. :

___:

GOVERNMENT'S MOTION FOR DETENTION

COMES NOW the United States of America, by and through its attorney, the United States Attorney for the Middle District of Georgia, and requests that the defendant be detained pursuant to 18 U.S.C. § 3142(e) and (f), and in support of said motion shows the following:

1. <u>Reason for Detention</u>.

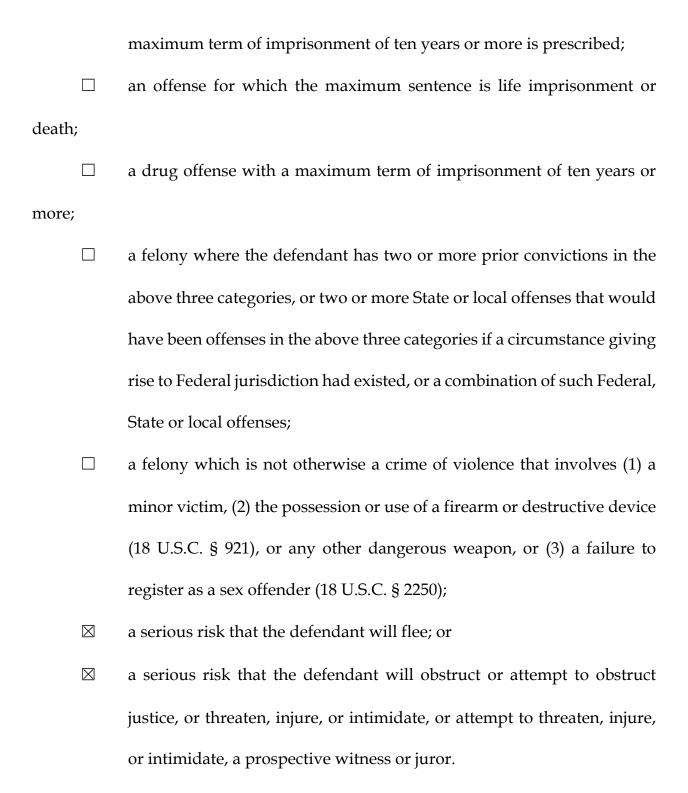
The Court should detain the defendant because there are no conditions of release which will reasonably assure (check one or both):

- oximes the defendant's appearance as required; and/or
- \boxtimes the safety of any other person or the community.

2. <u>Eligibility of Case</u>.

This case is eligible for a detention order because it involves (check all that apply):

a crime of violence (18 U.S.C. § 3156), sex trafficking (18 U.S.C. § 1591), or a federal crime of terrorism (18 U.S.C. § 2332b(g)(5)(B)) for which a



3. <u>Rebuttable Presumption (optional)</u>.

If set forth below, the Government invokes the rebuttable presumption that no condition or combination of conditions will reasonably assure the safety of any other

person and the community, pursuant to 18 U.S.C. §§ 3142(e)(2) and 3142(e)(3), because	
(check all that apply):	
	there is probable cause to believe that the defendant committed a drug
	offense with a maximum term of imprisonment of ten years or more;
	there is probable cause to believe that the defendant used or carried a
	firearm during and in relation to a crime of violence or drug trafficking
	crime, or possessed a firearm in furtherance of any such crime (18 U.S.C.
	§ 924(c));
	there is probable cause to believe that the defendant committed an
	offense involving a minor victim, as set forth in 18 U.S.C. § 3142(e)(3)(E);
	there is probable cause to believe that the defendant conspired to kill,
	maim, or injure persons or damage property in a foreign country (18
	U.S.C. § 956);
	there is probable cause to believe that the defendant committed an act of
	terrorism transcending national boundaries (18 U.S.C. § 2332b) or a
	federal crime of terrorism as set forth in 18 U.S.C. § 2332b(g)(5)(B) for
	which a maximum term of imprisonment of ten years or more is
	prescribed;
	there is probable cause to believe that the defendant committed a crime
	of peonage, slavery or human trafficking for which a maximum term of
	imprisonment of 20 years or more is prescribed (18 U.S.C. §§ 1581-1596);

or

the defendant has been convicted of a Federal offense that is described in 18 U.S.C. § 3142(f)(1), or of a State or local offense that would have been an offense described in § 3142(f)(1) if a circumstance giving rise to Federal jurisdiction had existed; the offense was committed while the defendant was on release pending trial for a Federal, State, or local offense; and a period of not more than five years has elapsed since the date of conviction for the offense, or the release of the defendant from imprisonment, whichever is later.

4. <u>Time for Detention Hearing</u>.

The Government requests that the Court conduct the detention hearing:

- \boxtimes at the initial appearance; or
- \Box after a continuance of three days.

The Government requests leave of Court to file a supplemental motion with additional grounds or presumption for detention should this be necessary.

RESPECTFULLY SUBMITTED, this 14th day of January, 2021.

PETER D. LEARY ACTING UNITED STATES ATTORNEY

BY: <u>Leah E. McEwen</u>

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CERTIFICATE OF SERVICE

I, Leah E. McEwen, Assistant United States Attorney, hereby certify that I electronically filed the within and foregoing *Government's Motion for a Detention* by electronically filing said motion with the Clerk of the Court using the CM/ECF system.

This this 14th day of January, 2021.

PETER D. LEARY ACTING UNITED STATES ATTORNEY

BY: /s/ Leah E. McEwen

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